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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**STIPULATION AND ORDER AS MODIFIED
FOR MODIFICATION OF SCHEDULING
ORDER**

Pursuant to Civil Local Rule 6-2, Lead Plaintiff Glen Littleton (“Lead Plaintiff”) and Defendants Tesla, Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, “Defendants”) (collectively, Lead Plaintiff and Defendants are referred to as the “Parties”), by and through their undersigned counsel of record, submit the following stipulation and proposed order:

WHEREAS, on May 31, 2020, the Court entered a Case Management and Pretrial Order for Jury Trial setting the litigation deadlines for this case (Dkt. No. 261);

WHEREAS, on May 3, 2021, the Parties filed a Stipulation with Proposed Order requesting a Modification to the Pretrial Order (Dkt. No. 320);

WHEREAS, on May 5, 2021, the Court entered the Stipulated Request for Order Changing Time and Order as Modified (Dkt. No. 321);

WHEREAS, despite the Parties' best efforts in scheduling depositions, due to schedules and other restraints, some of Defendants' depositions are not scheduled until late October, after the deadline for Opening Expert Reports;

WHEREAS, because the Defendants' depositions may affect the opening expert reports, counsel for Defendants and counsel for Lead Plaintiff have conferred regarding extending certain litigation deadlines for this case;

WHEREAS, the Parties agreed to modify certain deadlines for this case while maintaining the previously scheduled dates for the Final Pretrial Conference and Trial;

NOW, THEREFORE, the Parties hereby jointly request that the Court enter an order establishing the following deadlines in this case:

EVENT	CURRENT SCHEDULE	MODIFIED SCHEDULE
Disclosure of Experts and Topics	October 12, 2021	November 5, 2021
Opening Expert Reports	October 12, 2021	November 5, 2021
Rebuttal Expert Reports	November 16, 2021	December 3, 2021
Expert Depositions	December 3, 2021	January 6, 2022
Dispositive Motions	December 16, 2021	January 11, 2022
Opposition to Dispositive Motions	January 17, 2022	February 1, 2022
Reply in Further Support of Dispositive Motions	February 7, 2022	February 15, 2022
Hearing on Dispositive Motions	March 3, 2022	March 10, 2022
Final Pretrial Conference	May 3, 2022	May 3, 2022
Trial	May 31, 2022	May 31, 2022

1 Dated: October 6, 2021

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1 Dated: October 6, 2021

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Pursuant to Civil Local Rule No. 5-1(i)(3), all signatories concur in filing this Stipulation.

Dated: October 6, 2021

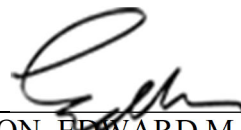
LEVI & KORSINSKY, LLP

By: /s/ Adam M. Apton

Adam M. Apton

SO ORDERED.

Dated: October 8, 2021



HON. EDWARD M. CHEN
United States District Judge